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USDC SDNY

DOCUMENT

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DATE FILED: 10-13-16

MEMO ENDORSED

October 7, 2016

BY FACSIMILE

Hon. P. Kevin Castel
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 11D
New York, New York 10007-1312

Re: United States of America v Galanis, 15 Cr. 643 (PKC)

Dear Judge Castel:

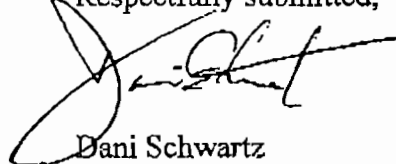
This law firm represents non-party ECC SPE LLC ("ECC"). I write to respectfully request that ECC be added as an interested party to this action.

Pursuant to this Court's August 15, 2016 Consent Order of Forfeiture, the defendant forfeited to the United States his interest in the real property known as and located at 260 West Broadway, Unit 1/2C, New York, New York (the "Mortgaged Property").

ECC is the lender on a \$7,000,000.00 first mortgage encumbering the Mortgaged Property. ECC has prepared a petition in conformity with 21 U.S.C. § 853(n) and applicable law in order to establish and protect its interest in the Mortgaged Property, and to ensure ECC receives appropriate proceeds from any sale of the Mortgaged Property. However, ECC cannot electronically file its petition without first being added to the case.

Accordingly, we respectfully request that ECC be added so that we can file its petition. All appearing parties have been copied on this correspondence.

Respectfully submitted,



Dani Schwartz

cc: Counsel for all parties (by facsimile)

The government is directed to respond by October 20, 2016.
SO ORDERED
USDC
10-12-16

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Facsimile Transmission

Date: October 7, 2016			
To:	Company:	Fax Number:	Telephone:
Hon. P. Kevin Castel	Daniel Patrick Moynihan United States Courthouse	212-805-7949	(212) 805-0262
From: Dani Schwartz, Esq.	Direct Dial: 212.551.8489		
Client/Matter No.: 26309/0231	Pages: 2 (including cover page)		

Re: United States of America v Galanis, 15 Cr. 643 (PKC)

Message: Please see the attached letter.

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